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John DeTore, Esq.
Rubin and Rudman
50 Rowe's Wharf
Boston, Mass. 02110

RE: Bay State Gas proposed GCIM, DTE 01-81

Dear John:

This is LEAN's first set of data requests in this proceeding, subject to Instructions 1-5 set forth in the Department's Information Requests. Please let me know if there are any questions or problems with any of these requests.

1. Please provide average gas commodity prices for each of the past 25 years, as follows:
 - a. separately for Company supplies for storage, peaking, and all other (differentiating the latter between summer and winter),
 - b. national wellhead.
2. Please provide purchased each gas adjustment clause amount over the past 25 years, by rate class.
3. For each of the indices described in the Company's testimony, please provide annual average values, summer and winter, for each of the past 25 years.
4. Please provide an aging of Company residential accounts receivable (30 days, 60, 90, 120+), on average for each of the last five years.
5. (a) Explain *and quantify* how "restructuring of wholesale gas markets has brought benefits to Bay State's customers" (DaFonte testimony at 14). Explain *and quantify* the benefits to Bay State's residential customers.
6. Please provide a copy of the Company's last approved forecast and supply plan.
7. Please provide the workpapers for the response to IR DTE-1-34.
8. Assume that trading loss(es) are sufficient to affect the Company's cost of capital. Please state whether it is the Company's position that

- ratepayers would be held harmless from such increases in the Company's cost of capital.
9. Please provide docket numbers, order dates, and PUR citations for the approvals referred to in IR AllEnergy-1-5.
 10. Please describe the terms (durations) available for physical purchases of all types.
 11. Please refer to the Company's responses to IR DTE-14. 17, and 18.
 - a. Please explain in detail the operation of a commodity price stabilization plan.
 - b. Please list all the portfolio tactics that would be employed in a commodity price stabilization plan.
 - c. Please explain how a commodity price stabilization plan would operate without interfering in any way with a GCIM.
 12. Please refer to DaFonte testimony at 17 and IR AllEnergy-1-16. Please explain the distinction between the price of commodity gas and the "reliability premium."

Sincerely,

LEAN et al., by

ec: Service List